

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
UNITED STATES)	
)	
v.)	Criminal Case No. 1:21-CR-10208
)	
CHRISTINA LUA)	
_____)	

**MOTION OF DEFENDANT CHRISTINA LUA FOR LEAVE TO TRAVEL
FROM CALIFORNIA TO OREGON FOR EMPLOYMENT AS REQUIRED BY
HER EMPLOYER**

Now comes Defendant Christina Lua and, through her undersigned counsel, respectfully moves this Honorable Court for leave to travel from her current residence in California to Oregon for the period of April 6 through April 9, 2022, and as occasionally required by her employer thereafter, so that Ms. Lua can perform her employment obligations. More specifically, Ms. Lua works as a human resources manager at Timber Cove Resorts in Jenner, CA, which has a sister property at The Setting Inn in Newberg, OR that falls within Ms. Lua's scope of responsibilities. Ms. Lua's employer has assigned her to participate in employee interviews at The Setting Inn from April 6 until April 9, 2022, and has informed Ms. Lua that she is expected to visit The Setting Inn for 2-3 day periods approximately every sixty (60) days thereafter.

Ms. Lua has remained fully compliant with all pre-trial conditions of release ordered by this Court on October 15, 2021. Ms. Lua is being directly supervised in California by USPO Brad Wilson, who has no objection to this request. The United

States, through AUSA Alatheia Porter, and the District of Massachusetts Pretrial Services, through USPO Brendan Murray, also have no objection to this motion.

WHEREFORE, Defendant Christina Lua respectfully moves this Honorable Court for leave to travel to Oregon for employment purposes only during the period of April 6 until April 9, 2022, and as directed by her employer thereafter, with advance notice of all such travel to be tendered by Ms. Lua to USPO Wilson.

Respectfully submitted,
CHRISTINA LUA
By her attorney,

/s/ John S. Day

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Date: March 24, 2022

Certificate of Service

I, John S. Day, hereby certify that, on March 24, 2022, this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”), and will be sent by electronic mail to USPO Brendan Murray and USPO Brad Wilson.

/s/ John S. Day

John S. Day, Esq.
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